

Exhibit E

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

STEVEN E. SCHWARTZ,

Plaintiff,

V.

COGNIZANT TECHNOLOGY
SOLUTIONS CORPORATION,
a Delaware Corporation,

Defendant.

[illegible]

C.A. No. 2019-1004-AGB

Original Filed: Feb. 12, 2020

Public Version Filed: Feb. 19, 2020

**PLAINTIFF’S REPLY BRIEF IN SUPPORT
OF HIS MOTION FOR SUMMARY JUDGMENT**

HEYMAN ENERIO
GATTUSO & HIRZEL LLP
Samuel T. Hirzel, II (# 4415)
Gillian L. Andrews (# 5719)
Aaron M. Nelson (# 5941)
300 Delaware Avenue, Suite 200
Wilmington, DE 19801
(302) 472-7300
Attorneys for Plaintiff Steven E. Schwartz

Dated: February 12, 2020

in a coordinated fashion on the initial document review and the Bohrer Firm's document reviewers were billed out at lower rates than the Paul, Weiss staff attorneys. This work could have just as easily been reflected on the Paul, Weiss invoices at higher rates.

The more appropriate comparison is Cognizant's own internal FCPA investigation. Cognizant seemingly ignores that its own public disclosures state that it spent *at least \$79 million* on its own internal FCPA investigation.⁸⁶ It also overlooks that the Bohrer Firm is conducting an investigation of the same relevant facts in India without civil litigation tools for discovery, access to documents or business leverage over potential witnesses. When viewed in comparison to Cognizant's spend on its own investigation—to say nothing of the unquantifiable resources being employed against him by the U.S. Government—Mr. Schwartz's fees and expenses are demonstratively reasonable.

⁸⁶ (See Ex. 3 at 21).

HEYMAN ENERIO
GATTUSO & HIRZEL LLP

/s/ Samuel T. Hirzel, II

Samuel T. Hirzel, II (# 4415)

Gillian L. Andrews (# 5719)

Aaron M. Nelson (# 5941)

300 Delaware Avenue, Suite 200

Wilmington, DE 19801

(302) 472-7300

Words: 7,981

Attorneys for Plaintiff Steven E. Schwartz

Dated: February 12, 2020

EFiled: Feb 19 2020 12:17PM EST

Transaction ID 64740053

Case No. 2019-1004-AGB



CERTIFICATE OF SERVICE

Aaron M. Nelson, Esquire, hereby certifies that on February 12, 2020, copies of the foregoing Reply Brief in Support of Plaintiff's Motion for Summary Judgment were served electronically on the following:

David E. Ross, Esquire
Anthony M. Calvano, Esquire
ROSS ARONSTAM & MORITZ LLP
100 S. West Street, Suite 400
Wilmington, DE 19801

/s/ Aaron M. Nelson

Aaron M. Nelson (# 5941)